IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

	Objection Deadline: February 23, 2015, at 4:00 p.m. Hearing Date: March 4, 2015, at 4:00 p.m.
Reorganized Debtors.) (Jointly Administered)
W. R. GRACE & CO., et al. 1) Case No. 01-01139 (KJC)
In re:) Chapter 11

CERTIFICATION OF NO OBJECTION REGARDING MOTION REQUESTING ENTRY OF AN ORDER: (A) FILING JOINT DEFENSE AGREEMENT UNDER SEAL; AND (B) APPLYING THE PROTECTIVE PROVISIONS OF FED. R. EVID. 502 THERETO [DOCKET NO. 32499]

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection or other responsive pleading to *Motion Requesting Entry of an Order: (A)*Filing Joint Defense Agreement Under Seal; and (B) Applying the Protective Provisions for Fed.

R. Evid. 502 Thereto (the "Motion") filed on February 3, 2015. The undersigned further certifies that he has caused the Court's docket in this case to be reviewed and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Motion, responses to the Motion were to be filed and served no later than February 23, 2015 at 4:00 p.m.

The Reorganized Debtors comprise W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or "Grace") and W. R. Grace & Co.-Conn. ("Grace-Conn.").

It is hereby respectfully requested that the Order attached to the Motion be entered at the Court's earliest convenience.

Dated: February 27, 2015

KIRKLAND & ELLIS LLP Adam Paul John Donley 300 North LaSalle Street Chicago, IL 60654 Telephone: (312) 862-2000 Facsimile: (312) 862-2200

and

THE LAW OFFICES OF ROGER HIGGINS, LLC Roger J. Higgins 1 North Bishop Street Suite 14 Chicago, IL 60607 Telephone: (312) 666-0431

and

PACHULSKI STANG ZIEHL & JONES LLP

Aura Davis Jones (Bar No. 2436) Games E. O'Neill (Bar No. 4042)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899-8705 Telephone: (302) 652-4100

Facsimile: (302) 652-4400

Co-Counsel for the Reorganized Debtors